

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

EXHIBIT D

ELYSE McKENNA _____)
Plaintiff _____)
v. _____) Civil Action No. 2:24-cv-12347

ROBERT F. RILEY, et al. _____)
Defendant _____)

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: _____
(Name of person to whom this subpoena is directed)

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

The entire psychotherapy/psychiatric file (as described in attached Authorization) and billing record of Elyse McKenna (a/k/a Elyse Heid), DOB [REDACTED] 1993, including but not limited to intake form(s), assessments, session notes, psychiatric summaries, reports, evaluations, recommendations, work notes, telephone notes, and all Behavioral Health records.

Place: Mail or electronic submission to: tdavis@khvpf.com Kienbaum Hardy Viviano Pelton & Forrest, P.L.C. 280 N. Old Woodward Ave., Suite 400, Birmingham, MI 48009	Date and Time: Tuesday, 06/17/25 5:00 p.m.
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Inspection of Premises: **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 06/02/2025

KINIKIA D. ESSIX, CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Thomas J. Davis

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) DEFENDANTS Robert F. Riley and Riley & Hurley, P.C. _____, who issues or requests this subpoena, are:

Thomas J. Davis (P78626), Kienbaum Hardy Viviano Pelton & Forrest, P.L.C, 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009, tdavis@khvpf.com, (248) 645-0000

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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